

## Sanders Solicitors Privacy Policy

1. Sanders Solicitors takes privacy seriously and we are committed to protecting it for your benefit and well as the firm generally. This policy tells you what to expect when we collect personal information.
2. In this policy the following terms are used:
  - **Personal Data:** means any information identifying any person or information relating to any person that we can identify (directly or indirectly) from that information. Personal Data includes information revealing racial or ethnic origin, political opinions, religious or similar beliefs, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data and all factual information (for example, a name, email address, telephone numbers, location or date of birth). It also includes information about that person's actions or behaviour and opinions about that person and any financial data such as bank accounts, payment card details as well as all communications to and from you.
  - **Processing or Process:** any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, as well as organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.
3. This Privacy Policy aims to inform you about how we Process Personal Data. We are committed to protecting your privacy and the confidentiality of the Personal Data. We undertake to preserve the confidentiality of the Personal Data you provide to us and hope that you reciprocate. Our policy complies with the Data Protection Act 2018 (Act) and the EU General Data Protection Regulation (GDPR).
4. The law requires us to tell you about your rights and our obligations to you in regard to the Processing of Personal Data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>
5. Except as set out below, we do not share, sell, or disclose to a third party, any Personal Data collected through our website.

### Data Protection Officer

6. Daniel Gearing is our appointed data protection officer (DPO) who is responsible for ensuring that our policy is followed. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact Daniel Gearing.

### Data we Process

7. We adhere to the principles relating to Processing of Personal Data as set out in the GDPR which require Personal Data to be:

- a. Processed lawfully, fairly and in a transparent manner;
  - b. collected only for specified, explicit and legitimate purposes;
  - c. adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed;
  - d. accurate and where necessary kept up to date;
  - e. not kept in a form which permits identification for longer than is necessary for the purposes for which the data is Processed;
  - f. Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage;
  - g. made available to you to exercise certain rights in relation to the Personal Data.
8. We are responsible for and must be able to demonstrate compliance with the data protection principles above. If basis for which we process your personal information is no longer relevant then we may immediately stop processing your data.
  9. If the basis changes, then if required by law ,we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

**If you do not provide the personal information we need**

10. Where we have a legal or contractual right or need to collect Personal Data and you fail to provide that Personal Data when requested, we may not be able to perform any services for you. In that case, we may notify you that we have to cease act for you.

**Why we Process Personal Data**

11. When you contact us in anyway or otherwise agree to our terms and conditions, a contract is formed between you and us. In order to carry out our obligations under that contract, we must process the Personal Data you give us in order to: verify your identity for security purposes; provide you with our services and provide you with suggestions and advice.
12. Through certain actions, when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our services, you provide your consent to us to Process your Personal Data.
13. Wherever possible, we aim to obtain your explicit consent to Process Personal Data.
14. We continue to process Personal Data until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists. You may withdraw your consent at any time by instructing us in writing. However, if you do, you may not be able to use our website or our services further.
15. We may Process Personal Data if there is a legitimate interest to do so and after having given careful consideration to:
  - whether the same objective could be achieved through other means;
  - whether Processing (or not Processing) might cause you harm;

- whether you would expect us to Process your Personal Data, and whether you would consider it reasonable to do so.

16. For example, we may Process your Personal Data for the purposes of:

- record-keeping for the proper and necessary administration of our business;
- responding to unsolicited communication from you to which we believe you would expect a response;
- protecting and asserting the legal rights of any party;
- insuring against or obtaining professional advice that is required to manage business risk;
- protecting your interests where we believe we have a duty to do so.

17. We must process your information in order to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

### **Retention of Personal Data**

18. Except as otherwise mentioned in this Policy, we keep your Personal Data only for as long as required by us:

- i. to provide you with the services you have requested;
- ii. to comply with any legislation (i.e tax laws);
- iii. to support a claim or defence in court or to conduct litigation.

19. When determining the relevant retention periods, we will take into account factors including:

- i. our contractual obligations and rights in relation to the Personal Data;
- ii. legal obligations under applicable law to retain Personal Data for a certain period of time;
- iii. legal statute of limitations;
- iv. our legitimate interests where we have carried out balancing tests;
- v. potential disputes; and
- vi. guidelines issued by relevant data protection authorities.

20. Otherwise, we securely erase your Personal Data where we no longer require it for the purposes collected.

### **Personal Data provided on the understanding that it will be shared with a third party**

21. Our website allows you to post Personal Data with a view to that Personal Data being read, copied, downloaded, or used by other people. Where necessary to perform the service you have a contract with us to provide, you agree that we may share your Personal Data with others to assist with and/or provide that service.

22. The Personal Data we collect about you will be transferred and stored in any manner within UK. We are careful and transparent about who your information is shared with.

23. We may also share your Personal Data:
- i. if we are under a duty to disclose or share your Personal Data in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation or regulatory requirement. This includes exchanging Personal Data with other companies and other organisations for the purposes of fraud protection and prevention;
  - ii. in order to enforce our contractual terms with you and any other agreement;
  - iii. to protect our rights, including to prevent fraud; and
  - iv. with such third parties as we reasonably consider necessary in order to prevent crime, e.g. the police.
24. We take steps to protect Personal Data from unauthorised access and against unlawful processing, accidental loss, destruction and damage. Unfortunately, the transmission of Personal Data via the internet and any data stored by IT is not completely secure. Although we will take steps to protect your Personal Data, we cannot guarantee the security of your Personal Data and any transmission of your Personal Data is at your own risk. Once we have received your Personal Data, we will use procedures and security features to try to prevent unauthorised access.
25. Once Personal Data enters the public domain, we have no control over what any third party may do with it. We accept no responsibility for their actions at any time. Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we will delete Personal Data.

## **Your Rights**

26. You have rights when it comes to how we handle Personal Data. These include rights to:
- (a) withdraw your consent to Processing at any time;
  - (b) receive certain information about the Processing activities;
  - (c) request access to your Personal Data that we hold;
  - (d) prevent our use of your Personal Data for direct marketing purposes;
  - (e) ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or Processed or to rectify inaccurate data or to complete incomplete data;
  - (f) restrict Processing in specific circumstances;
  - (g) challenge Processing which has been justified on the basis of our legitimate interests or in the public interest;
  - (h) prevent Processing that is likely to cause damage or distress to you or anyone else;
  - (i) be notified of a breach of the use of your Personal Data or any relevant legislation which is likely to result in high risk to your rights and freedoms;
  - (j) make a complaint to the supervisory authority;
  - (k) in limited circumstances, receive or ask for your Personal Data to be transferred to a third party in a structured, commonly used and machine-readable format.

## **Job application and employment**

27. If you send us Personal Data in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

28. If we employ you, we collect Personal Data about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your Personal Data for six years before destroying or deleting it.

### **Cookies**

29. Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.
30. Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.
31. Your web browser should allow you to delete cookies. It also should allow you to prevent or limit their use of cookies. Cookies are placed by software that operates on our servers, and by software operated by third parties whose services we use. If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

### **Your duty to inform us of changes and access to and removal of your Personal Data**

32. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes.
33. At any time you may review or update Personal Data that we hold about you. You may request us to provide you with a copy of any Personal Data we hold for you. After receiving the request, we will tell you when we expect to provide you with the Personal Data, and whether we require any fee for providing it to you. This may limit the service we can provide to you.
34. When we receive any request to access, edit or delete Personal Data, we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

### **Compliance with the law**

35. Our privacy policy has been compiled so as to comply with the law of the legal jurisdiction in which we do business. If you think it fails to satisfy the law of your jurisdiction, you must tell us. It is your choice as to whether you use our website.

### **Review of this privacy policy**

36. We may update this Privacy Policy from time to time. The terms that apply to you are those posted here on our website on the day you use our website. If you have any question regarding our privacy policy, please contact us.

## Complaining

37. When we receive a complaint, we record all the Personal Data you have given to us. We use that information to resolve your complaint. If your complaint requires us to contact some other person, we may decide to give to that other person some of the Personal Data contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.
38. We may compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.
39. You can find further information about our complaint handling procedure on our webpage. If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
40. If you are in any way dissatisfied about how we process your Personal Data, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.